

Benjamin Silverman

Attorney-at-Law

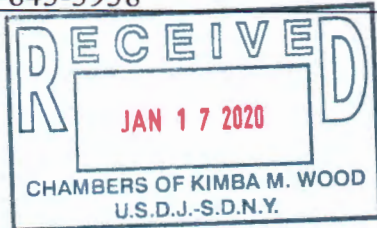
224 West 30th St., Suite 302

New York, New York 10001

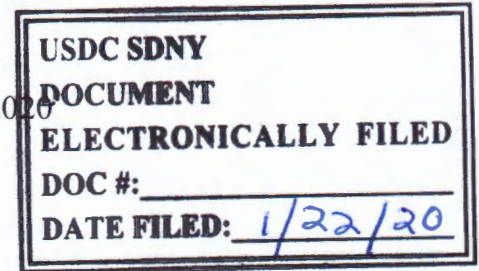
Benjamin@bsilvermanlaw.com

Fax: 646-843-3938

Telephone 212-203-8074



January 16, 2020



By ECF

Honorable Kimba M. Wood

United States District Judge

Southern District of New York

500 Pearl Street

New York, NY 10007

Re: *United States v. Yang*, 18 Cr. 799 (KMW)

MEMO ENDORSED

Your Honor:

I represent Luoyi Chen in the above-captioned case and I write with the consent of the Government and counsel for all remaining defendants – Jian Biao Zhang, Wenxin Duan, and Shuaiqi Wang – respectfully to request a two-month adjournment of the motion schedule and trial date. The reason for this request is to permit the parties additional time to discuss dispositions and to obtain English translations of recordings of the confidential informant and defendants. The translations, which are taking longer than anticipated for the Government to produce, are integral to the defense, pretrial motions, and trial preparation. At the September 30, 2019 conference, the Court scheduled trial for the week of May 2, 2020, and defense motions due on January 13, 2020. Last month, the Court adjourned the due date for defense motions to February 12, 2020.

All parties are available for a trial beginning on July 13, 20, and 27. I have spoken with the Court's law clerk who informs me that July trial dates may be available. The Government estimates that a trial will last 1-2 weeks. We also request a corresponding adjournment of the motion schedule as follows:

Defense Motions:

April 20

Government Opposition:

May 18

Replies (if any):

May 27

} Granted
kmw

Hon. Kimba M. Wood
United States District Judge
U.S. v. Yang
January 16, 2020
Page 2

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Benjamin Silverman
Benjamin Silverman

cc: AUSA Alexandra Rothman (by ECF)
AUSA Sebastian Swett (by ECF)
All Counsel of Record (by ECF)

*Trial is adjourned to July 13,
2020. If counsel would like
time excluded, they shall submit
a proposed Speedy Trial Act order.*

1-21-20
SO ORDERED: N.Y., N.Y.

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.